

JORGE ELIAS MARTINEZ-CARRILLO
also known as "Orejon"

JOSE ALFREDO CHAVEZ
also known as "el Chivo"
MARCO ANTONIO ELIZONDO

while aiding and abetting one another and others did unlawfully and willfully seize, confine, kidnap, and abduct and otherwise hold for ransom, reward, or otherwise

and, in committing and in furtherance of the commission of the offense the defendants did use a means, facility, and instrumentality of interstate and foreign commerce, namely a cellular phone.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

Count Two

From on or about May 5, 2019 through on or about May 7, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

LUIS ANGEL ROSAS-JIMENEZ
also known as "Ferrari"

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count Three

On or about May 7, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

an alien who had previously been denied admission, excluded, deported and removed, knowingly and unlawfully entered, attempted to enter, and was at any time found in the United States, to wit: near Edinburg, Texas said defendant not having obtained the consent to reapply for admission into the United States from the Attorney General of the United States and Secretary of Homeland Security, the successor, pursuant to Title 6, United States Code, Sections 202(3), 202(4), and 557.

In violation of Title 8, United States Code, Section 1326(a).

Count Four

On or about May 7, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JORGE ELIAS MARTINEZ-CARRILLO
also known as "Orejon"

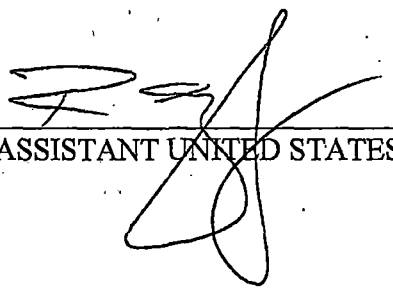
an alien who had previously been denied admission, excluded, deported and removed, knowingly and unlawfully entered, attempted to enter, and was at any time found in the United States, to wit: near Edinburg, Texas said defendant not having obtained the consent to reapply for admission into the United States from the Attorney General of the United States and Secretary of Homeland Security, the successor, pursuant to Title 6, United States Code, Sections 202(3), 202(4), and 557.

In violation of Title 8, United States Code, Section 1326(a).

A TRUE BILL

FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY